

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

GEOTAG INC.,

Plaintiff

vs.

FRONTIER COMMUNICATIONS
CORPORATION, LOCAL.COM
CORPORATION, DEX ONE
CORPORATION, WINDSTREAM
COMMUNICATIONS, INC., YELLOW
BOOK USA, INC., INTELIOUS, INC.,
CENTER'D CORPORATION, IDC
NETWORKS, INC., GO2 MEDIA, INC.,
HELLOMETRO INCORPORATED,
MAGICYELLOW, INC., SOLFO, INC.,
YELP!, INC. and CITYGRID MEDIA, LLC,

Defendants.

CIVIL ACTION NO. 2:10-CV-265-TGW

JURY TRIAL DEMANDED

**PLAINTIFF'S ANSWER TO THE COUNTERCLAIMS OF DEFENDANT
CITYGRID MEDIA, LLC**

Plaintiff GEOTAG, INC. ("Plaintiff") responds to the counterclaims of Defendant CITYGRID MEDIA, LLC ("Defendant") filed September 20, 2010, as follows:

COUNTERCLAIMS

THE PARTIES

1. Plaintiff admits the allegations in Paragraph 1, upon information and belief.
2. Plaintiff admits the allegations in Paragraph 2.

JURISDICTION AND VENUE

3. Plaintiff admits that jurisdiction is proper in this Court and that venue is proper in this district. Except as so admitted, the allegations in Paragraph 3 are denied.

4. Plaintiff admits the allegations in Paragraph 4.

FACTUAL BACKGROUND

5. Plaintiff admits that it has asserted in its Complaint that Defendant infringes the '474 Patent. Plaintiff further admits that there is an actual controversy between the parties relating to infringement and/or validity of the '474 Patent. Except as so admitted, the allegations in Paragraph 5 are denied.

COUNT ONE

Declaratory Judgment of Non-Infringement of the '474 Patent

6. Plaintiff restates and incorporates by reference Paragraphs 1 through 5 above.

7. Plaintiff admits the allegations in Paragraph 7.

8. Plaintiff admits that Defendant purports to bring counterclaims under the laws of the United States for non-infringement, but denies that these counterclaims have any factual or legal basis.

COUNT TWO

Declaratory Judgment of Invalidity of the '474 Patent

9. [Paragraph number 9 does not exist in Defendant's counterclaim].

10. Plaintiff restates and incorporates by reference paragraphs 1 through 9 above.

11. Plaintiff admits the allegations in Paragraph 11.

12. Plaintiff admits that Defendant purports to bring counterclaims under the laws of the United States for invalidity, but denies that these counterclaims have any factual or legal basis.

PRAYER FOR RELIEF

Although no answer is required to Defendant's request for relief, Plaintiff denies all allegations of Paragraphs a through f and further denies that any relief should be granted to Defendant.

Plaintiff demands a trial by jury on all matters raised by Defendant's counterclaims and by Plaintiff in its Original Complaint (and any supplements or amendments thereto).

Dated: September 22, 2010.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of September, 2010, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Jonathan T. Suder